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10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **SOUTHERN DIVISION**

14 JOANNA ARDALAN, ESQ, an
15 individual; ONE LLP, a California
16 Limited Liability Partnership,

17 Plaintiff,

18 v.

19 DOE 1, d.b.a LAW INTEGRAL, LLC,
20 business entity unknown; DOE 2, d.b.a
21 DEPUTY TRADEMARK, business
22 entity unknown; DOE 3, p.k.a
23 MICHELLE SPRAGUE, an individual;
24 DOE 4, d.b.a TRADEMARK
25 INTEGRAL, business entity unknown;
26 DOE 5, d.b.a
27 BRANDREGISTRATION.ORG,
28 business entity unknown; and DOES 6
through 10, inclusive,

Defendants.

Case No. 8:23-cv-01243-KK-(DFMx)
Hon. Kenly Kiya Kato

**SUPPLEMENTAL
DECLARATION OF JOANNA
ARDALAN IN OPPOSITION TO
MOTION TO SET ASIDE
DEFAULT**

1 I, Joanna Ardalan, am an attorney and party to the above captioned action. I
2 have personal knowledge of the facts stated herein and if called to testify could and
3 would testify as follows:

4 1. On October 30, 2024, the Court issued an order permitting plaintiffs to
5 conduct early discovery by issuing subpoenas to two banks that received money
6 from the victims of Defendants' fraud. (Dkt. 53.) As explained in Plaintiffs' ex parte
7 application for the order granting early discovery, Law Integral and Deputy
8 Trademark received money from Jarrod Cruzat, a victim of the fraud, who wired the
9 money to an account with JP Morgan Chase ("JP Morgan Account") and an account
10 with Community Federal Savings Account. Plaintiffs issued the subpoena with a
11 deadline of December 13, 2024 to JP Morgan Chase. (Dkt. 51.)

12 2. JP Morgan represented that it could not produce documents by
13 December 13, 2024 and requested and received an extension to December 27, 2024.
14 The other bank, Community Federal Savings Bank, has not yet produced
15 documents. I have sent them correspondence in an attempt to meet and confer with
16 them about their production.

17 3. On December 27, 2024, JP Morgan produced documents showing that
18 Binotech LLC received money *from* the JP Morgan Account. These documents
19 directly impeach the declarations and representations filed by Defendants. *E.g.*,
20 Hamza Khan Declaration 54-3, ¶ 5 ("I received no money from anyone associated
21 with or who claimed to be associated with Joanna Ardalan."). Attached as **Exhibit**
22 **A** is a true and correct *redacted* copy of a spreadsheet I received from JP Morgan
23 showing the wires to and from the JP Morgan Account. Significantly, Binotech,
24 LLC, which is one of the Defendants that seeks to set aside default is a "credit
25 party" to at least six transactions. *See* Credit Party 2: line 120, \$500 (page 67), line
26 136, \$475 (page 68), line 138, \$500 (page 68), line 150, \$240 (page 68), line 156,
27 \$1,427 (page 168), line 165, \$195 (page 69). The address listed in the records as
28 associated with Binotech is 2172 Lucy Lane, York, Pennsylvania 17404, which

1 Defendants admit is the address associated with them. Because the spreadsheet is so
2 large, each row spans over multiple pages. To make it easier to follow, I caused the
3 first column to reflect the row number.

4 I declare under penalty of perjury that the facts stated herein are true and
5 correct.

6 Executed in Los Angeles, California on this 7th day of January 2025.
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9 By: /s/ Joanna Ardalan

10 Joanna Ardalan
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